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7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 SILVIA AHN

CASE NO: 1:22-00586-JLT-CDB

12 Plaintiff

13 v.

**GEO GROUP, INC'S RESPONSE TO
PLAINTIFF'S MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT**

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15
16 GEO GROUP INC ET AL.

17 Defendants.
18 _____/

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20 THIS RESPONSE IS FILED by Defendant GEO Group, Inc. in response to the
21 Plaintiff Sylvia Ahn's Motion to File a proposed Second Amended Complaint, which requests:

22 (1) adding the United States as a defendant; and

23 (2) add six claims against defendants Immigration and Customs Enforcement (ICE)
24 and the United States under the Federal Tort Claims Act (FTCA).

25 GEO GROUP adopts and supports the Response as filed by ICE and therefore,
26 requests the Motion to be denied. 3

27 Therefore, for the foregoing reasons, GEO GROUP reasserts its positions and
28 defense as set forth in its pending Motion to Dismiss and respectfully requests that this Court
29 deny the Plaintiff's request to file her Second Amended Complaint.

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Respectfully submitted,

Dated: March 31, 2023

CHERYL WILKE ESQ.

By: *Cheryl Wilke*

Attorney for Geo Group

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 31, 2023, a true and correct copy of the foregoing has been served on all counsel of record via this Court's CM/ECF electronic filing system.

/s/ *Cheryl Wilke*

Attorney for Geo Group